

DECLARATION OF TYLER BROOME
Pursuant to 28 U.S.C. § 1746

I, Tyler Broome, hereby state that I have personal knowledge of the facts set forth below and, if called to testify, I could and would testify as follows:

1. I am a United States citizen. I work as an Investigator for the Federal Trade Commission (“FTC”) in the Bureau of Consumer Protection’s Division of Marketing Practices. The Division of Marketing Practices investigates persons and entities that may be violating the FTC Act and other laws enforced by the FTC. My office address is 600 Pennsylvania Avenue, NW, CC-8563, Washington, DC 20580.
2. I was assigned to work on the FBA MACHINE matter. I reviewed records relating to THE FBA MACHINE INC, 1HR DELIVERIES INC, 3PL LOGISTIC AUTOMATION INC, 1800 NE 27TH CORP, DAILY DISTRO LLC, FBA SUPPORT LLC, FBA SUPPORT NJ CORP, PASSIVE SCALING INC, SALES SUPPORT NEW JERSEY INC, and HOURLY RELIEF INC.

OVERVIEW OF FINDINGS

3. During the course of my investigation, I reviewed documents from various financial institutions, which the FTC received pursuant to Civil Investigative Demands (“CID”).
4. All accounts obtained via CID and reviewed were corporate accounts. No personal accounts were obtained for review. Below is a summary of the accounts reviewed:

	Financial Institution	Account	Name on Account	Authorized Signer(s)
1	Bank of America	[REDACTED] 0600	DAILY DISTRO LLC	<i>*Signature Card Not Available*</i>
2	Bank of America	[REDACTED] 0590	DAILY DISTRO LLC	<i>*Signature Card Not Available*</i>
3	Bank of America	[REDACTED] 5679	FBA SUPPORT LLC	Bratislav Rozenfeld (Member)
4	Bank of America	[REDACTED] 4856	FBA SUPPORT LLC	Bratislav Rozenfeld (Member)
5	Chase	[REDACTED] 6070	1HR DELIVERIES INC	Bratislav Rozenfeld (President)
6	Chase	[REDACTED] 2295	3PL LOGISTIC AUTOMATION INC	Bratislav Rozenfeld (President)
7	Chase	[REDACTED] 5393	HOURLY RELIEF INC	Bratislav Rozenfeld (President)
8	Chase	[REDACTED] 0626	PASSIVE SCALING INC	Bratislav Rozenfeld (President)
9	Chase	[REDACTED] 3915	PASSIVE SCALING INC	Bratislav Rozenfeld (President)
10	Chase	[REDACTED] 5073	FBA SUPPORT NJ CORP	Bratislav Rozenfeld (President)
11	Signature Bank	[REDACTED] 2854	1HR DELIVERIES INC	Bratislav Rozenfeld (President)
12	Signature Bank	[REDACTED] 2870	3PL LOGISTIC AUTOMATION INC	Bratislav Rozenfeld (President)
13	Signature Bank	[REDACTED] 8881	1800 NE 27th CORP	Bratislav Rozenfeld (President/Secretary/Treasurer)
14	Signature Bank	[REDACTED] 2889	DAILY DISTRO LLC	Bratislav Rozenfeld (Member)
15	Signature Bank	[REDACTED] 2897	FBA SUPPORT NJ CORP	Bratislav Rozenfeld (President)
16	Signature Bank	[REDACTED] 8687	PASSIVE SCALING INC	Bratislav Rozenfeld (President/Owner)
17	Signature Bank	[REDACTED] 2862	SALES SUPPORT NEW JERSEY INC	Bratislav Rozenfeld (President)
18	TD Bank	[REDACTED] 4483	THEFBA MACHINE INC	Bratislav Rozenfeld (Owner)
19	TD Bank	[REDACTED] 3800	THEFBA MACHINE INC	Bratislav Rozenfeld (Owner)

*Bank of America claimed that signature cards were not available for accounts 0600 and 0590.

However, the address associated with this account is [REDACTED] Edgewater, New Jersey [REDACTED] which is associated with Bratislav Rozenfeld.

Consumer Payment Estimate

5. I estimate total consumer payments made between January 23, 2020, and February 29, 2024, to range from approximately \$11,217,885.09 to \$18,029,879.55. The reasoning for this range is explained by the method of which funds were collected by the defendants' accounts.
6. The lower estimate of \$11,217,885.09 consists of funds that were deposited directly to a defendant account, by means of wire transfer, peer-to-peer transfer (e.g. Zelle), or ACH transfer and often included a direct reference to the entity making the payment (i.e., I was able to determine that an individual or business – a business which I believed was controlled by a consumer and made payment for the benefit of the individual consumer(s) – was the originator of the payment). For purposes of this summary, I will refer to these types of payments as 'direct consumer payments.'
 - a. My methodology for estimating direct consumer payments is as follows: I flagged transactions as a 'Consumer Payment' based upon one or more of the following characteristics: a) a transaction descriptor (wire transfer memo, for example) which indicated the purpose of the transaction to be activity known to the FTC to be associated as a product or service of the defendant; b) the amount paid by the counterparty aligned with an amount known to the FTC to be associated with a product or service of the defendants; or c) the counterparty's name was identified through additional records produced by third-parties as a purchaser of a product or service of the defendant.
7. Direct consumer payments were deposited to accounts in the names of PASSIVE SCALING INC, 1HR DELIVERIES INC, FBA SUPPORT LLC, DAILY DISTRO LLC, and FBA SUPPORT NJ CORP between April 17, 2020, and December 29, 2023. The most frequently

occurring observed direct consumer payment amount was \$30,000.00, which was observed with 88 unique consumers. The second-most frequently occurring amount was \$50,000.00, observed with 42 unique consumers. In addition, I observed 17 consumers who paid \$100,000.00 or more, including one consumer who paid \$200,596.00. In total, I estimate that 397 unique consumers made direct payments to the defendants. A breakdown of total estimated direct consumer payments deposited to each defendant account is shown below:

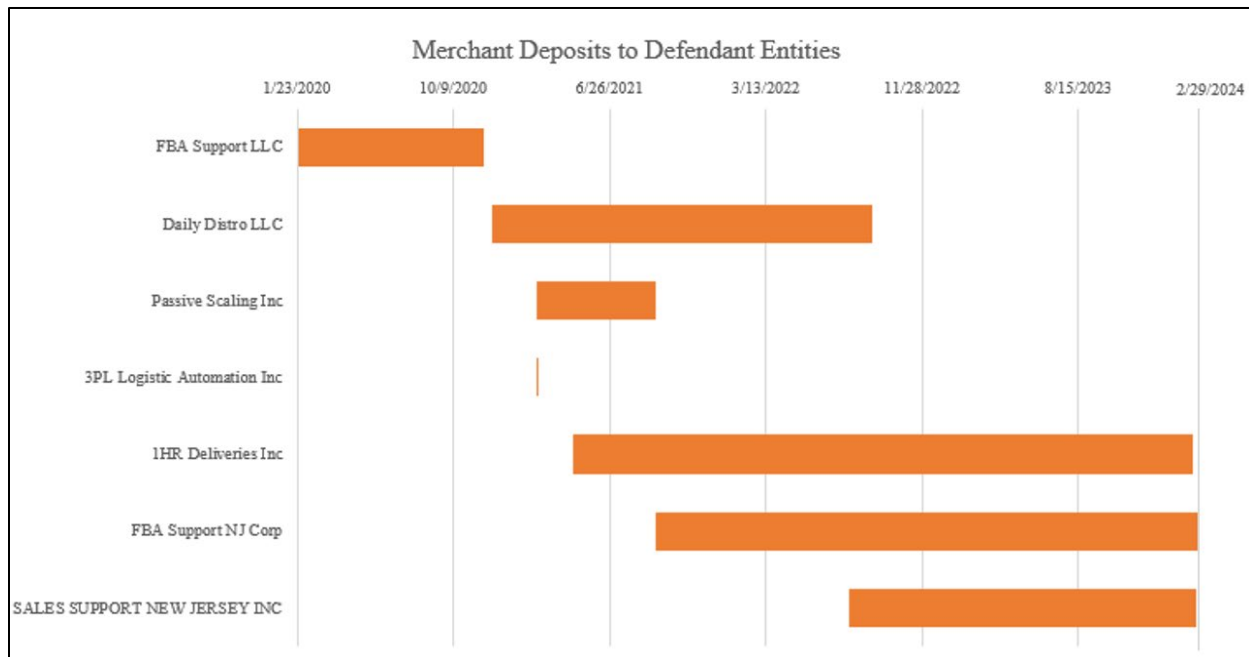
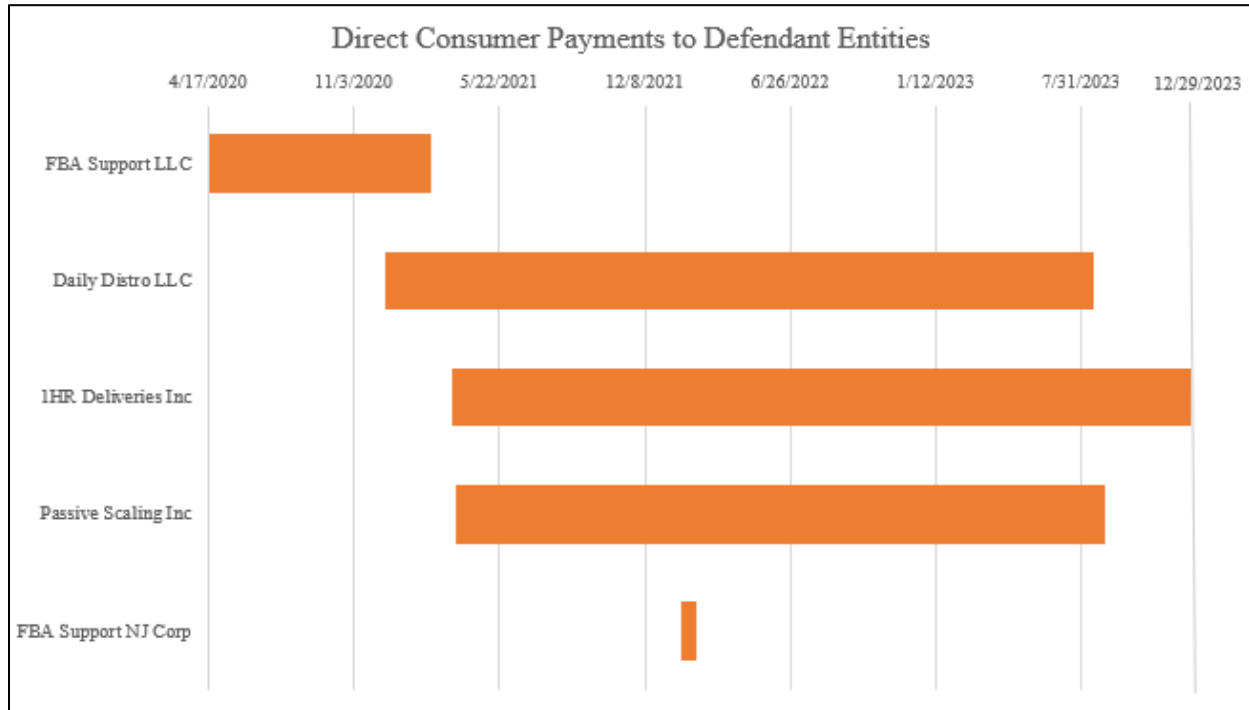
Account Name & Number	Consumer Payments
<input type="checkbox"/> Passive Scaling Inc	\$ 9,628,078.81
<input type="checkbox"/> [REDACTED] 0626	\$ 7,094,077.00
<input type="checkbox"/> [REDACTED] 8687	\$ 2,515,006.93
<input type="checkbox"/> [REDACTED] 3915	\$ 18,994.88
<input type="checkbox"/> 1HR DELIVERIES INC	\$ 1,214,080.35
<input type="checkbox"/> [REDACTED] 2854	\$ 806,574.06
<input type="checkbox"/> [REDACTED] 6070	\$ 407,506.29
<input type="checkbox"/> FBA Support LLC	\$ 308,710.00
<input type="checkbox"/> [REDACTED] 5679	\$ 308,710.00
<input type="checkbox"/> Daily Distro LLC	\$ 47,015.93
<input type="checkbox"/> [REDACTED] 2889	\$ 24,741.56
<input type="checkbox"/> [REDACTED] 0600	\$ 18,550.65
<input type="checkbox"/> [REDACTED] 0590	\$ 3,723.72
<input type="checkbox"/> FBA SUPPORT NJ CORP	\$ 20,000.00
<input type="checkbox"/> [REDACTED] 5073	\$ 20,000.00
Grand Total	\$ 11,217,885.09

8. The higher estimate of \$18,029,878.55 is based on the inclusion of an additional estimated \$6,811,994.46 of financial activity with various merchant service accounts observed within the defendant accounts. Merchant accounts typically collect payments via electronic payment cards and then make batch deposits to a linked bank account.

9. I am aware that the defendants charged consumers recurring fees for inventory, revenue sharing, and software subscriptions and it is my belief that these merchant accounts were utilized to collect those recurring payments. For purposes of this summary, I will refer to these types of transactions as ‘merchant deposits.’
10. Merchant deposits were deposited to accounts in the names of FBA SUPPORT NJ CORP, FBA SUPPORT LLC, SALES SUPPORT NEW JERSEY INC, DAILY DISTRO LLC, 1HR DELIVERIES INC, PASSIVE SCALING INC, and 3PL LOGISTIC AUTOMATION INC between January 23, 2020, and February 29, 2024. A breakdown of total net merchant deposits to each account is shown below:

Account Name & Number	Merchant Deposits	Merchant Debits	Net Merchant Deposits
<input type="checkbox"/> FBA SUPPORT NJ CORP	\$ 3,866,148.62	\$ 150,850.70	\$ 3,715,297.92
[REDACTED] 2897	\$ 3,572,455.86	\$ 144,680.99	\$ 3,427,774.87
[REDACTED] 5073	\$ 293,692.76	\$ 6,169.71	\$ 287,523.05
<input type="checkbox"/> FBA Support LLC	\$ 2,003,594.91	\$ 50,631.68	\$ 1,952,963.23
[REDACTED] 4856	\$ 1,994,491.28	\$ 49,940.32	\$ 1,944,550.96
[REDACTED] 5679	\$ 9,103.63	\$ 691.36	\$ 8,412.27
<input type="checkbox"/> SALES SUPPORT NEW JERSEY INC	\$ 467,472.84	\$ 30,874.13	\$ 436,598.71
[REDACTED] 2862	\$ 467,472.84	\$ 30,874.13	\$ 436,598.71
<input type="checkbox"/> Daily Distro LLC	\$ 303,220.33	\$ 6,292.16	\$ 296,928.17
[REDACTED] 2889	\$ 155,195.61	\$ 512.54	\$ 154,683.07
[REDACTED] 0590	\$ 143,185.51	\$ 5,779.62	\$ 137,405.89
[REDACTED] 0600	\$ 4,839.21		\$ 4,839.21
<input type="checkbox"/> 1HR DELIVERIES INC	\$ 200,226.46	\$ 20.03	\$ 200,206.43
[REDACTED] 2854	\$ 143,665.19		\$ 143,665.19
[REDACTED] 6070	\$ 56,561.27	\$ 20.03	\$ 56,541.24
<input type="checkbox"/> Passive Scaling Inc	\$ 200,000.00		\$ 200,000.00
[REDACTED] 0626	\$ 200,000.00		\$ 200,000.00
<input type="checkbox"/> 3PL LOGISTIC AUTOMATION INC	\$ 10,000.00		\$ 10,000.00
[REDACTED] 2295	\$ 10,000.00		\$ 10,000.00
Grand Total	\$ 7,050,663.16	\$ 238,668.70	\$ 6,811,994.46

11. The following two graphs illustrate the timeframes of direct consumer payments and merchant deposits to the defendant entities as they were observed through the bank records.



Consumer Refund Estimate

12. I estimate the amount of consumer refunds made between October 18, 2021, and February 28, 2023, to be approximately \$113,043.20. Consumer refunds were paid from the following accounts:

Account Name & Account	Consumer Refunds
Passive Scaling Inc	\$ 106,833.00
0626	\$ 73,500.00
8687	\$ 33,333.00
Daily Distro LLC	\$ 6,210.20
2889	\$ 6,210.20
Grand Total	\$ 113,043.20

13. I did not recognize financial activity indicative of consumer refunds from accounts in the name of 3PL LOGISTIC AUTOMATION INC.

- a. The most recently observed transaction observed in an account associated with 3PL LOGISTIC AUTOMATION INC occurred on November 9, 2023. Since that date, the balance in this account (Signature 2870) was \$220.57, where it has remained unchanged up until the most recently available statement encompassing transactions up until February 29, 2024.
14. My methodology for estimating consumer refunds is as follows: I flagged transactions as a 'Consumer Refund' if the transaction descriptor made a direct reference to a refund or buyout, or if I recognized a recipient of defendant-originated funds to be a consumer that had previously made payment to the target.

Net Financial Impact to Consumers

15. Taking the direct consumer payments - \$11,217,885.09 - less the refunds - \$113,043.20 - gives a net direct consumer payment figure of approximately \$11,104,841.89.
16. Adding in the net merchant deposits - \$6,811,994.46 – to the net direct consumer payment figure gives a high-end estimate of net financial impact to consumers of approximately \$17,916,836.35.

Commingling

17. I estimate the amount commingled amongst the defendants' accounts between January 9, 2020, and February 29, 2024, to be approximately \$5,797,468.58. A summary of the amounts transferred amongst entities is summarized in the table below, along with the timeframe detail of the financial interactions of each defendant entity (see paragraphs 18-54).

	Sent	Received
PASSIVE SCALING INC	\$ 681,523.58	\$ 1,028,432.00
FBA SUPPORT NJ CORP	\$ 367,850.77	\$ 329,702.00
DAILY DISTRO LLC	\$ 191,081.00	\$ 14,300.00
1HR DELIVERIES INC	\$ 112,000.00	\$ 102,400.00
1800 NE 27th CORP	\$ 5,091.81	\$ 522,600.00
HOURLY RELIEF INC	\$ 2,000.00	\$ 3,000.00
SALES SUPPORT NEW JERSEY INC	\$ -	\$ 55,930.00
3PL LOGISTIC AUTOMATION INC	\$ 3,500.00	\$ 500.00
DAILY DISTRO LLC	\$ 66,500.00	\$ 3,363,859.95
FBA SUPPORT LLC	\$ 40,000.00	\$ -
FBA SUPPORT NJ CORP	\$ 26,000.00	\$ 2,316,765.04
1HR DELIVERIES INC	\$ 500.00	\$ 978,094.91
SALES SUPPORT NEW JERSEY INC	\$ -	\$ 20,000.00
1800 NE 27th CORP	\$ -	\$ 49,000.00
1HR DELIVERIES INC	\$ 89,117.00	\$ 156,500.00
FBA SUPPORT NJ CORP	\$ 54,432.00	\$ 148,000.00
1800 NE 27th CORP	\$ 15,900.00	\$ -
3PL LOGISTIC AUTOMATION INC	\$ 13,550.00	\$ 6,650.00
SALES SUPPORT NEW JERSEY INC	\$ 5,000.00	\$ -
HOURLY RELIEF INC	\$ 235.00	\$ 1,850.00
FBA SUPPORT NJ CORP	\$ 29,786.05	\$ 370,500.00
1800 NE 27th CORP	\$ 24,500.00	\$ 10,000.00
SALES SUPPORT NEW JERSEY INC	\$ 3,300.00	\$ 16,000.00
3PL LOGISTIC AUTOMATION INC	\$ 1,986.05	\$ -
HOURLY RELIEF INC	\$ -	\$ 16,000.00
FBA SUPPORT LLC	\$ -	\$ 328,500.00
SALES SUPPORT NEW JERSEY INC	\$ 250.00	\$ 11,000.00
1800 NE 27th CORP	\$ -	\$ 11,000.00
THE FBA MACHINE LLC	\$ 250.00	\$ -
FBA SUPPORT LLC	\$ 328,500.00	\$ 40,000.00
FBA SUPPORT NJ CORP	\$ 328,500.00	\$ -
DAILY DISTRO LLC	\$ -	\$ 40,000.00
3PL LOGISTIC AUTOMATION INC	\$ 7,150.00	\$ 19,036.05
1HR DELIVERIES INC	\$ 6,650.00	\$ 13,550.00
PASSIVE SCALING INC	\$ 500.00	\$ 3,500.00
FBA SUPPORT NJ CORP	\$ -	\$ 1,986.05
HOURLY RELIEF INC	\$ 20,850.00	\$ 2,235.00
FBA SUPPORT NJ CORP	\$ 16,000.00	\$ -
PASSIVE SCALING INC	\$ 3,000.00	\$ 2,000.00
1HR DELIVERIES INC	\$ 1,850.00	\$ 235.00
Total amount commingled across all accounts:	\$ 5,797,468.58	

18. Between February 25, 2021, and December 28, 2023, PASSIVE SCALING INC sent \$367,850.77 to FBA SUPPORT NJ CORP.
19. Between July 28, 2022, and January 31, 2024, FBA SUPPORT NJ CORP sent \$329,702.00 to PASSIVE SCALING INC.
20. Between May 6, 2022, and August 24, 2023, PASSIVE SCALING INC sent \$191,081.00 to DAILY DISTRO LLC.
21. Between August 3, 2022, and November 15, 2023, DAILY DISTRO LLC sent \$14,300.00 to PASSIVE SCALING INC.
22. Between March 2, 2021, and September 28, 2022, PASSIVE SCALING INC sent \$112,000.00 to 1HR DELIVERIES INC.
23. Between December 13, 2022, and February 5, 2024, 1HR DELIVERIES INC sent \$102,400.00 to PASSIVE SCALING INC.
24. Between September 1, 2023, and January 3, 2024, PASSIVE SCALING INC sent \$5,091.81 to 1800 NE 27th CORP.
25. Between March 21, 2022, and December 6, 2023, 1800 NE 27th CORP sent \$522,600.00 to PASSIVE SCALING INC.
 - a. In multiple instances, the PASSIVE SCALING INC account receiving money from 1800 NE 27th CORP did not have sufficient funds to complete its next outgoing transaction. For example, on March 20, 2023, Signature Bank account 8687 (PASSIVE SCALING INC) had a balance of \$592.16 prior to receiving \$40,000.00 from Signature Bank account 8881 (1800 NE 27th CORP). On March 21, 2023, Signature Bank account 8687 (PASSIVE SCALING INC) made a payment to American Express of \$38,165.63. No other incoming funds were received to the

PASSIVE SCALING INC account prior to the payment, so this payment would not have been possible were it not for the funds transferred from 1800 NE 27th CORP.

26. On March 2, 2021, PASSIVE SCALING INC sent \$2,000.00 to HOURLY RELIEF INC.

27. On March 30, 2021, HOURLY RELIEF INC sent \$3,000.00 to PASSIVE SCALING INC.

28. Between August 12, 2022, and February 16, 2024, SALES SUPPORT NEW JERSEY INC sent \$55,930.00 to PASSIVE SCALING INC.

29. Between March 22, 2021, and March 30, 2021, PASSIVE SCALING INC sent \$3,500.00 to 3PL LOGISTIC AUTOMATION INC.

30. On September 29, 2023, 3PL LOGISTIC AUTOMATION INC sent \$500.00 to PASSIVE SCALING INC.

31. Between January 14, 2021, and February 1, 2021, DAILY DISTRO LLC sent \$40,000.00 to FBA SUPPORT LLC.

32. Between August 22, 2023, and December 28, 2023, DAILY DISTRO LLC sent \$26,000.00 to FBA SUPPORT NJ CORP.

33. Between July 19, 2022, and February 23, 2024, FBA SUPPORT NJ CORP sent \$2,316,765.04 to DAILY DISTRO LLC.

34. On January 8, 2024, DAILY DISTRO LLC sent \$500.00 to 1HR DELIVERIES INC.

35. Between August 22, 2022, and February 23, 2024, 1HR DELIVERIES INC sent \$978,094.91 to DAILY DISTRO LLC.

36. Between February 7, 2023, and May 30, 2023, SALES SUPPORT NEW JERSEY INC sent \$20,000.00 to DAILY DISTRO LLC.

37. Between March 29, 2023, and February 21, 2024, 1800 NE 27th CORP sent \$49,000.00 to DAILY DISTRO LLC.

38. Between June 18, 2021, and February 29, 2024, 1HR DELIVERIES INC sent \$54,432.00 to FBA SUPPORT NJ CORP.
39. Between September 13, 2021, and January 26, 2024, FBA SUPPORT NJ CORP sent \$148,000.00 to 1HR DELIVERIES INC.
40. Between January 6, 2023, and October 18, 2023, 1HR DELIVERIES INC sent \$15,900.00 to 1800 NE 27th CORP.
41. Between August 14, 2023, and November 8, 2023, 1HR DELIVERIES INC sent \$13,550.00 to 3PL LOGISTIC AUTOMATION INC.
42. Between September 14, 2023, and September 29, 2023, 3PL LOGISTIC AUTOMATION INC sent \$6,650.00 to 1HR DELIVERIES INC.
43. On July 12, 2023, 1HR DELIVERIES INC sent \$5,000.00 to SALES SUPPORT NEW JERSEY INC.
44. On September 19, 2022, 1HR DELIVERIES INC sent \$235.00 to HOURLY RELIEF INC.
45. Between October 17, 2022, and November 22, 2022, HOURLY RELIEF INC sent \$1,850.00 to 1HR DELIVERIES INC.
46. Between October 18, 2023, and February 7, 2024, FBA SUPPORT NJ CORP sent \$24,500.00 to 1800 NE 27th CORP.
47. On February 15, 2023, 1800 NE 27th CORP sent \$10,000.00 to FBA SUPPORT NJ CORP.
48. On November 24, 2023, FBA SUPPORT NJ CORP sent \$3,300.00 to SALES SUPPORT NEW JERSEY INC.
49. Between July 12, 2023, and February 27, 2024, SALES SUPPORT NEW JERSEY INC sent \$16,000.00 to FBA SUPPORT NJ CORP.

50. Between March 23, 2023, and August 9, 2023, FBA SUPPORT NJ CORP sent \$1,986.05 to 3PL LOGISTIC AUTOMATION INC.

51. Between March 11, 2021, and September 1, 2022, HOURLY RELIEF INC sent \$16,000.00 to FBA SUPPORT NJ CORP.

52. Between January 9, 2020, and February 22, 2021, FBA SUPPORT LLC sent \$328,500.00 to FBA SUPPORT NJ CORP.

53. On February 15, 2023, 1800 NE 27th CORP sent \$11,000.00 to SALES SUPPORT NEW JERSEY INC.

54. On August 29, 2023, SALES SUPPORT NEW JERSEY INC sent \$250.00 to THEFBA MACHINE INC.

OPTIMIZE DIGITAL LLC

55. Between April 20, 2021, and February 9, 2022, PASSIVE SCALING INC sent \$3,048,500.00 to OPTIMIZE DIGITAL LLC.

56. Between May 5, 2021, and February 24, 2022, OPTIMIZE DIGITAL sent \$46,000.00 to PASSIVE SCALING INC.

Sources of Funding of Defendants' Accounts

57. The following charts show each account holder's primary sources of income, as a percentage of its total inflows:

a.	PASSIVE SCALING INC Account Funding Sources	
	Direct Consumer Payment	82%
	Merchant Deposit	2%
	Commingling	9%
	Total	93%
b.	1HR DELIVERIES INC Account Funding Sources	
	Direct Consumer Payment	48%
	Merchant Deposit	8%
	Commingling	11%
	Resale Experts	12%
	1HR DELIVERIES INC - Transfers between accounts in the same name	8%
	Total	87%
c.	FBA SUPPORT LLC Account Funding Sources	
	Direct Consumer Payment	7%
	Merchant Deposit	46%
	Commingling	1%
	Valiant Consultants	15%
	FBA SUPPORT LLC - Transfers between accounts in the same name	27%
	Total	96%
d.	SALES SUPPORT NEW JERSEY INC Account Funding Sources	
	Merchant Deposit	90%
	Commingling	4%
	Total	94%

HOURLY RELIEF INC Account Funding Sources	
Shopify	26%
Upwork Escrow	67%
Commingling	4%
Total	97%

e.

FBA Support NJ Corp Account Funding Sources	
Direct Consumer Payment	0.40%
Merchant Deposit	78%
Commingling	10%
SWIFT SHIP INC	
VILSONSPEKTOR	10%
Total	98%

f.

3PL LOGISTIC AUTOMATION INC Account Funding Sources	
Merchant Deposit	34%
Commingling	65%
Total	99%

g.

TheFBA MACHINE INC Account Funding Sources	
Commingling	59%
Unknown Deposit	33%
Total	92%

h.

DAILY DISTRO LLC Account Funding Sources	
Direct Consumer Payment	1%
Merchant Deposit	7%
Commingling	81%
Total	89%

i.

Tracing Consumer Payments

58. The top 25 counterparties that received funds from PASSIVE SCALING INC comprise 96% of the total estimated amount received from consumers.

PASSIVE SCALING INC - Outflow Recipients			
	Counterparty		Total Amount Received
1	OPTIMIZE DIGITAL LLC		\$ 3,048,500.00
2	American Express		\$ 887,629.14
3	Gregory B Taylor PO IOTA Trust Account		\$ 665,542.53
4	Cyriam B Micapaid		\$ 525,912.09
5	Empire Flippers		\$ 519,876.24
6	Landmark Title Services Inc		\$ 430,724.08
7	FBA SUPPORT NJ CORP		\$ 367,850.77
8	QBATCH		\$ 339,000.00
9	CHATEAU DE SALES LLC		\$ 335,650.00
10	Bank of the Philippines - Unspecified Recipient		\$ 279,752.72
12	Upwork Escrow		\$ 226,788.10
13	Max All Things Porsche		\$ 200,000.00
14	DAILY DISTRO LLC		\$ 191,081.00
15	INFITEL BUSINESS PROCESS OURSOURCING		\$ 158,522.74
16	AZADI GOODS LLC		\$ 153,250.00
17	LEASE MASTER INC		\$ 150,000.00
18	RONG MA		\$ 145,503.93
19	1HR DELIVERIES INC		\$ 112,000.00
20	Russell Mccarver		\$ 100,000.00
21	Chase Checking Account 3915		\$ 100,000.00
22	AMEN DIRECTION LLC		\$ 97,000.00
23	Wells Fargo Credit Card		\$ 79,842.08
24	DEBORAH MELNICK		\$ 79,000.00
25	Todds Jewelry Co		\$ 70,000.00
	Top 25 Outflow Recipients Total		\$ 9,263,425.42
	Direct Consumer Payments	\$ 9,457,482.81	
	Merchant Deposits	\$ 200,000.00	
	Total Estimated Amount Received From Consumers		\$ 9,657,482.81
	Top Outflow Recipients as a Percentage of Consumer Payments		96%

59. The top 8 counterparties that received funds from 1HR DELIVERIES INC comprise over 100% of the total estimated amount received from consumers.

1HR DELIVERIES INC - Outflow Recipients			
	Counterparty		Total Amount Received
1	DAILY DISTRO LLC		\$ 978,094.91
2	PASSIVE SCALING INC		\$ 102,400.00
3	Signature Acct 8679		\$ 76,277.63
4	Jerdonnalpalmer		\$ 68,877.29
5	National Presto Industries		\$ 63,712.40
6	FBA SUPPORT NJ CORP		\$ 54,432.00
7	American Express		\$ 50,000.00
8	Tatiana		\$ 43,823.15
	Top 8 Outflow Recipients Total		\$ 1,437,617.38
	Direct Consumer Payments	\$ 1,214,080.35	
	Merchant Deposits	\$ 200,226.46	
	Total Estimated Amount Received From Consumers		\$ 1,414,306.81
	Top Outflow Recipients as a Percentage of Consumer Payments		102%

60. The top 7 counterparties that received funds from FBA SUPPORT LLC comprise over 100% of the total estimated amount received from consumers.

FBA SUPPORT LLC - Outflow Recipients			
	Counterparty		Total Amount Received
1	American Express		\$ 502,239.29
2	Bank of America - Checking Account 2456		\$ 500,200.00
3	Cyriam B Micapaid		\$ 358,946.62
4	FBA SUPPORT NJ CORP		\$ 328,500.00
5	KINRAY INC		\$ 315,010.30
6	QBATCH		\$ 195,164.54
7	GOLI NUTRITION		\$ 194,400.00
	Top 7 Outflow Recipients Total		\$ 2,394,460.75
	Direct Consumer Payments	\$ 308,710.00	
	Merchant Deposits	\$ 2,003,594.91	
	Total Estimated Amount Received From Consumers		\$ 2,312,304.91
	Top Outflow Recipients as a Percentage of Consumer Payments		104%

61. The top 7 counterparties that received funds from FBA SUPPORT NJ CORP comprise over 100% of the total estimated amount received from consumers.

FBA SUPPORT NJ CORP - Outflow Recipients		
Counterparty		Total Amount Received
1 DAILY DISTRO LLC		\$ 2,251,529.39
2 ADP		\$ 778,299.93
3 PASSIVE SCALING INC		\$ 327,202.00
4 Signature Acct 8679		\$ 202,369.70
5 Intuit		\$ 150,850.70
6 1HR DELIVERIES INC		\$ 148,000.00
7 AP 2011 LLC		\$ 90,000.00
Top 7 Outflow Recipients Total		\$ 3,948,251.72
Direct Consumer Payments		\$ 20,000.00
Merchant Deposits		\$ 3,866,148.62
Total Estimated Amount Received From Consumers		\$ 3,886,148.62
Top Outflow Recipients as a Percentage of Consumer Payments		102%

62. The top 8 counterparties that received funds from SALES SUPPORT NEW JERSEY INC comprise over 100% of the total estimated amount received from consumers.

SALES SUPPORT NEW JERSEY INC - Outflow Recipients		
Counterparty		Total Amount Received
1 QBATCH		\$ 314,000.00
2 Amazon Web Service		\$ 71,863.02
3 PASSIVE SCALING INC		\$ 55,930.00
4 Swipe4Free		\$ 30,644.34
5 DAILY DISTRO LLC		\$ 20,000.00
6 FBA SUPPORT NJ CORP		\$ 16,000.00
7 Merchant Srvs		\$ 4,553.32
8 Internal Bank		\$ 25.00
Top 8 Outflow Recipients Total		\$ 513,015.68
Direct Consumer Payments		\$ -
Merchant Deposits		\$ 467,472.84
Total Estimated Amount Received From Consumers		\$ 467,472.84
Top Outflow Recipients as a Percentage of Consumer Payments		110%

63. The top 20 counterparties that received funds from DAILY DISTRO LLC comprise 99% of the total estimated amount received from consumers plus the amounts commingled from other defendant accounts. The amount of commingled funds (\$3,363,859.95) is included in this summary as DAILY DISTRO LLC was the top outflow for two defendant entities that received consumer payments (see the ‘1HR DELIVERIES INC – Outflows’ table in paragraph 59 and the ‘FBA SUPPORT NJ CORP – Outflows’ table in paragraph 61).

DAILY DISTRO LLC - Outflow Recipients			
	Counterparty		Total Amount Received
1	Zoeller Company		\$ 1,787,653.78
2	BCW Diversified Inc		\$ 490,870.90
3	Gusto		\$ 181,532.76
4	PURITY WHOLESALE GROCERS INC		\$ 169,363.36
5	DAILY DISTRO LLC		\$ 126,000.00
6	Sioux Chief Manufacturing Company		\$ 111,297.46
7	BEAUTIX INC		\$ 111,021.75
8	Fashion and Icon LLC		\$ 104,597.18
9	TCP HRB ACQUISITION LLC		\$ 79,375.36
10	GENERAL WIRE SPRING COMPANY		\$ 78,745.30
11	KRASDALE FOODS LLC		\$ 66,916.53
12	PLATSKY COMPANY INC		\$ 54,947.95
13	Annie International Inc		\$ 51,564.13
14	DAP INC		\$ 50,595.01
15	IRWIN NATURALS		\$ 50,513.91
16	FBA Support LLC		\$ 40,000.00
17	BCW SUPPLIES		\$ 37,846.12
18	DVDMD Enterprise		\$ 33,739.78
19	HARTELL MILTON ROY LLC		\$ 31,242.30
20	AMERICAN INTERNATIONAL INDUSTRIES		\$ 29,631.80
Top 20 Outflow Recipients Total			\$ 3,687,455.38
	Direct Consumer Payments	\$ 47,015.93	
	Merchant Deposits	\$ 303,220.33	
	Received Through Commingling	\$ 3,363,859.95	
	Total Estimated Amount Received From Consumers		\$ 3,714,096.21
Top Outflow Recipients as a Percentage of Consumer Payments			99%

64. The top 13 counterparties that received funds from 3PL LOGISTIC AUTOMATION INC comprise over 100% of the total estimated amount received from consumers and the amounts commingled from other defendant accounts. The commingled amount is included in this summary as it accounts for approximately 64% of 3PL LOGISTIC AUTOMATION's total incoming funds, and the first two outflow recipients from this account would have accounted for well over 100% of the total estimated amount received from consumers.

3PL LOGISTIC AUTOMATION - Outflow Recipients			
	Counterparty		Total Amount Received
1	Bank of the Philippines - Unspecified Recipient	\$	9,000.00
2	1HR DELIVERIES INC	\$	6,650.00
3	Signature Acct 8679	\$	3,600.00
4	NEVANA ARTWORKS LLC	\$	3,031.00
5	California FBA Prep	\$	2,396.70
6	FULFILLMENT PLUS INC	\$	1,489.48
7	Insurance	\$	746.00
8	Brandon Trucker	\$	600.00
9	PASSIVE SCALING INC	\$	500.00
10	TEXAS FULFILLMENT CENTER	\$	466.50
11	Chk 2372	\$	457.30
12	Internal Bank	\$	295.00
13	NYS DTF	\$	50.00
Top 20 Outflow Recipients Total		\$	29,281.98
Direct Consumer Payments		\$	-
Merchant Deposits		\$	10,000.00
Received Through Commingling		\$	19,036.05
Total Estimated Amount Received From Consumers		\$	29,036.05
Top Outflow Recipients as a Percentage of Consumer Payments			101%

Purchase of Real Estate

65. Between September 23, 2021, and December 3, 2021, the following transactions were observed in Chase account 0626 (PASSIVE SCALING INC). It is my understanding that Bratislav ROZENFELD purchased the property of [REDACTED] Pompano Beach, Florida with a sale price of \$1,275,000.00 on or around November 30, 2021, per the publicly available Broward County online property records. The following transactions were made to Landmark Title Services Inc in Deerfield Beach, Florida (about six miles from Pompano Beach) and Gregory B Taylor IOTA Trust Account in Wilton Manors, Florida (also about six miles from Pompano Beach).

Account	Account Name	Posted Date	Description	Transaction Type	Counterparty	Debit
[REDACTED] 0626	Passive Scaling Inc	9/23/2021	Online Domestic Wire Transfer Via: Synovus Bank/061100606 A/C: Landmark Title Services Inc Deerfield Beach FL 33442 US Imad: 092381Qgc08C024707 Trn	Wire Transfer	Landmark Title Services Inc	\$ 120,000.00
[REDACTED] 0626	Passive Scaling Inc	10/28/2021	Online Domestic Wire Transfer Via: Synovus Bank/061100606 A/C: Landmark Title Services Inc Deerfield Beach FL 33442 US Imad: 102881 Qgc08C013682 Trn	Wire Transfer	Landmark Title Services Inc	\$ 55,000.00
[REDACTED] 0626	Passive Scaling Inc	12/1/2021	Online Domestic Wire Transfer Via: Fnb Coffee Cty/061204735 A/C: Gregory B Taylor PO IOTA Trust Acc Wilton Manors FL 33305 US Ref: Bratislav Rozenfeld -1800 NE 27th Corp Imad: 1201 B1Qgc05C023219 Trn	Wire Transfer	Gregory B Taylor PO IOTA Trust Account	\$ 500,000.00
[REDACTED] 0626	Passive Scaling Inc	12/2/2021	Online Domestic Wire Transfer Via: Fnb Coffee Cty/061204735 A/C: Gregory B Taylor PO IOTA Trust Acc Wilton Manors FL 33305 US Ref: 1800 NE 27th Ave Rozenfeld Imad 120281Qgc06C009511 Trn	Wire Transfer	Gregory B Taylor PO IOTA Trust Account	\$ 165,542.53
[REDACTED] 0626	Passive Scaling Inc	12/3/2021	Online Domestic Wire Transfer Via: Synovus Bank/061100606 A/C: Landmark Title Services Inc Deerfield Beach FL 33442 US Imad: 120381Qgc02C007030 Trn	Wire Transfer	Landmark Title Services Inc	\$ 255,724.08

a. The transactions on December 1st and 2nd include references to “1800 NE 27th.”

Signature Bank account 8881 (1800 NE 27th CORP) has received deposits from Airbnb totaling \$320,253.98 beginning on April 5, 2022, and continuing until February 26, 2024 (records for this account were available until February 29, 2024).

Potential Payroll and Salaries

66. Between February 16, 2022, and March 6, 2023, Signature Bank account 8687 (PASSIVE SCALING INC) wire transferred \$335,650.00 to CHATEAU DE SALES LLC.
67. Between November 10, 2023, and January 25, 2024, Signature Bank account 2897 (FBA SUPPORT NJ CORP) wire transferred \$20,596.00 to Wendy FRANCO.
68. Between January 10, 2023, and February 23, 2024, Signature Bank account 2897 (FBA SUPPORT NJ CORP) wire transferred \$10,772.50 to Bill STIFER.
69. Between March 6, 2020, and February 23, 2024, numerous defendant accounts made payments to ADP totaling \$797,803.41. ADP advertises “industry-leading online payroll and HR solutions, plus tax, compliance, benefit administration, and more.” A breakdown of the financial activity is shown below:
- a. Between March 6, 2020, and May 7, 2020, Bank of America accounts 5679 and 4856 (FBA SUPPORT LLC) paid ADP \$19,503.48.
 - b. Between January 4, 2021, and July 29, 2022, Chase account 5073 (FBA SUPPORT NJ CORP) paid ADP \$286,900.73.
 - c. Between July 29, 2022, and February 23, 2024, Signature Bank account 2897 (FBA SUPPORT NJ CORP) paid ADP \$491,399.20.

Money Sent to the Philippines

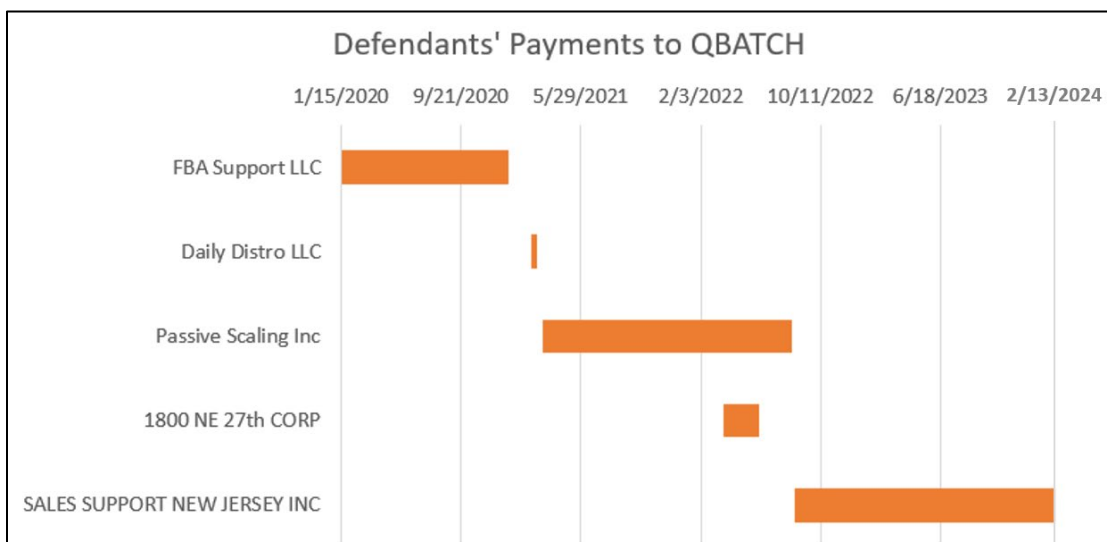
70. Between January 2, 2020, and February 29, 2024, the defendants' accounts sent approximately \$1,585,524.88 to various recipients via three banks based in the Philippines (Bank of the Philippine Islands, Security Bank Corporation, and Unionbank of the Philippines). Funds were sent from accounts in the name of FBA SUPPORT LLC, PASSIVE SCALING INC, and 3PL LOGISTIC AUTOMATION INC. A summary of the funds sent to each recipient from each defendant account is shown below:

Recipient	Total Sent	First Transaction	Last Transaction
<input type="checkbox"/> Cyriam B Micapaid	\$ 884,858.71		
FBA Support LLC	\$ 358,946.62	1/2/2020	2/12/2021
Passive Scaling Inc	\$ 525,912.09	1/31/2022	4/17/2023
<input type="checkbox"/> Bank of the Philippines - Unspecified Recipient	\$ 288,752.72		
3PL LOGISTIC AUTOMATION INC	\$ 9,000.00	3/5/2021	3/5/2021
Passive Scaling Inc	\$ 279,752.72	3/16/2021	12/28/2021
<input type="checkbox"/> INFITEL BUSINESS PROCESS OURSOURCING	\$ 176,522.74		
FBA SUPPORT NJ CORP	\$ 18,000.00	2/13/2024	2/29/2024
Passive Scaling Inc	\$ 158,522.74	4/26/2023	1/31/2024
<input type="checkbox"/> Mellany Lebradella	\$ 123,715.00		
FBA Support LLC	\$ 123,715.00	1/7/2020	4/13/2020
<input type="checkbox"/> Gladys Sungahid-Bautista	\$ 105,718.95		
FBA Support LLC	\$ 105,718.95	1/15/2020	4/13/2020
<input type="checkbox"/> Gary Rojo	\$ 5,956.76		
Passive Scaling Inc	\$ 5,956.76	6/6/2022	9/14/2022
Grand Total	\$ 1,585,524.88		

Payments to QBATCH

71. Between January 15, 2020, and February 13, 2024, numerous defendant accounts wire transferred a total of \$949,164.54 to QBATCH with a memo indicating the payment was for “software development.” A breakdown of the financial activity is shown below:

- a. Between January 15, 2020, and December 29, 2020, Bank of America accounts 5679 and 4856 (FBA SUPPORT LLC) wire transferred \$195,164.54 to QBATCH.
- b. Between February 16, 2021, and February 25, 2021, Bank of America account 0600 (DAILY DISTRO LLC) wire transferred \$21,000.00 to QBATCH.
- c. Between March 11, 2021, and December 24, 2021, Chase account 0626 (PASSIVE SCALING INC) wire transferred \$269,000.00 to QBATCH.
- d. Between February 16, 2022, and August 11, 2022, Signature Bank account 8687 (PASSIVE SCALING INC) wire transferred \$70,000.00 to QBATCH.
- e. Between March 22, 2022, and June 6, 2022, Signature Bank account 8881 (1800 NE 27th CORP) wire transferred \$80,000.00 to QBATCH.
- f. Between August 19, 2022, and February 13, 2024, Signature Bank account 2862 (SALES SUPPORT NEW JERSEY INC) wire transferred \$314,000.00 to QBATCH.



CLOSTER GREEN CORP

72. Between January 7, 2020, and January 11, 2021, Bank of America account 5679 (FBA SUPPORT LLC) paid \$285,186.28 to American Express. Within each of these 24 payments, there is a reference to "CLOSTER GREEN CORP." An example of one of these transactions as they appear in the bank statement is shown below:

01/11/21	AMERICAN EXPRESS DES:ACH PMT	ID: [REDACTED]	INDN:CLOSTER GREEN CORP.	CO	-10,762.45
	ID:1133133497 CCD				

73. Between January 2, 2020, and January 27, 2021, Bank of America account 5679 (FBA SUPPORT LLC) paid \$297,770.52 to Kinray Inc. Within each of these 29 payments, there is a reference to "CLOSTER GREEN CORP." An example of one of these transactions as they appear in the bank statement is shown below:

01/27/21	KINRAY, INC.	DES:COLLECTION ID: [REDACTED]	INDN:CLOSTER GREEN CORP	CO	-6,237.04
	ID:9024354101 CCD				

74. On June 10, 2021, a deposit was made to Chase account 6070 (1HR DELIVERIES INC) by Plastiq Inc for \$484.91. Within the transaction detail is a reference to "CLOSTER GREEN CORP WALMART REV SHARE MAY 2021." The transaction as it appears in the bank statement is shown below:

06/10	Orig CO Name:Plastiq Inc	Orig ID: [REDACTED]	Desc Date:210609 CO Entry	484.91
	Desc:Credit Sec:CCD Trace#:	[REDACTED]	Eed:210610 Ind ID:Pymtid Zhnq4C2	
	Ind Name:1 Hr Deliveries Inc	1243*Closter Green Corp*Walmart Rev Share May		
	20210000000000000000000000000000			

Defendants' Assets

75. Between August 12, 2021, and August 18, 2021, Chase account 0626 (PASSIVE SCALING INC) paid \$200,000.00 to “Max All Things Porsche.”
76. Between May 23, 2022, and February 8, 2024, Signature Bank account 8687 (PASSIVE SCALING INC) paid \$46,858.90 “Wells Fargo Auto.” The payments typically occurred once per month and almost always in the same amount of \$2,129.95. It is currently unknown what this financial activity might be associated with.
77. Between May 11, 2021, and January 11, 2022, Chase account 0626 (PASSIVE SCALING INC) paid Tesla approximately \$5,855.14 and received \$4,198.75 back from Tesla. Eight of these charges include descriptor references to “Supercharger” payments.
78. On March 28, 2022, Signature Bank account 8881 (1800 NE 27th CORP) paid “Tesla Motors \$4,497.85. Beginning on August 16, 2022, a series of 29 payments in the amount of \$9.99 begins to “Tesla Motors” from Signature Bank account 8881 and is seen as recently as February 16, 2024 (statements were available for this account up until February 29, 2024). Tesla’s website advertises a subscription called ‘Premium Connectivity’ which they report is “for the most intuitive and engaging ownership experience.”
79. Between February 7, 2020, and November 30, 2020, Bank of America account 5679 (FBA SUPPORT LLC) transferred \$67,543.42 to Robinhood, an investment platform.
80. On July 21, 2021, Chase account 0626 (PASSIVE SCALING INC) transferred \$10,000.00 to Robinhood.
81. On August 30, 2021, Chase account 0626 (PASSIVE SCALING INC) paid \$70,000.00 to “Todds Jewelry Co Inc.”

82. The most recently available statements for the analyzed accounts carried a total balance of \$61,645.59.


Potential Personal Expenses

83. The following expenses were observed in Chase account 0626 (PASSIVE SCALING INC) and may be indicative of personal spending:

- a. Approximately \$8,141.46 to various hotels and Airbnb's.
- b. Approximately \$7,682.82 to various charges in Mexico, including charges for spas, restaurants, and hotels. Nearly all of this amount (\$7,301.75) appeared over a one-week span in the bank statements between June 1, 2021, and June 8, 2021.
- c. Approximately \$5,933.25 to flights and travel services.
- d. Approximately \$1,863.54 to liquor stores and alcohol delivery services.
- e. Approximately \$1,055.71 to Citi Field (with transaction descriptions referencing "parking", "concessions", and "team stores") and "Gametime Tickets."
- f. Approximately \$1,007.83 to spas in New Jersey.
- g. Approximately \$919.47 to "Au Pair Care."
- h. Approximately \$681.47 to Home Depot.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 16, 2024
Washington, D.C.


Tyler Broome